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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 17, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Wireless Number Portability
CC Docket No. 95-116, Ex Parte

Dear Ms. Dortch:

On March 15, 2004, Cingular Wireless, LLC ("Cingular") represented by Brian Fontes, Vice President-Federal Relations, Ben Almond, Vice President-Federal Regulatory, Jim Bugel, Executive Director-Federal Regulatory, Beth Swett, Executive Director-External Affairs and Faith Seiders, Director- Sales Operations, met in separate meetings with Barry Ohlson, Legal Advisor to Commissioner Jonathan Adelstein and Jennifer Manner, Senior Counselor to Commissioner Kathleen Abernathy to discuss issues related to the referenced docket proceeding. The attached document was used for discussion purposes.

Pursuant to Section 1.1206 of the Commission's Rules, this notification is being submitted to your office. Please associate this notification and accompanying material with the referenced docket proceedings.

If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink that appears to read 'Jim Bugel'.

Jim Bugel
Executive Director-Federal Regulatory

Attachment

Cc: Barry Ohlson
Jennifer Manner

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WLNIP

Road to Improvement

March 15, 2004

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Agenda

- Current statistics
- Process Improvements
- Continuing Challenges
- Wireline to Wireless Porting
- May 2004 Implementation



Aging Report – 11/24/03 through 2/29/04

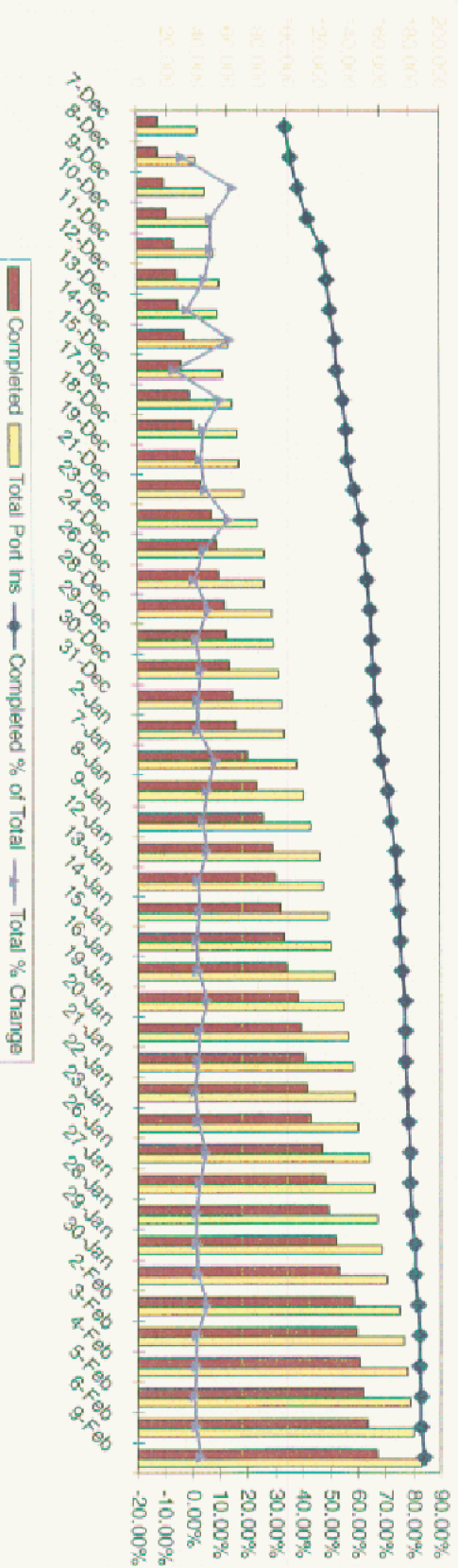
Port Ins and Port Outs

- **Cumulative Totals* by Status**
 - Completed Status: 89%
 - Confirmed Status: 7%
 - Resolution Required: 2.3%
 - Delayed/No Response: 1.6%

*Totals do not include any cancelled port requests and it does include port requests processed through the bulksweeps. Wireless and wireline ports are included.

Port In Activity - Cumulative

Completed and Total Port-In Activity



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Port In Facts

- Wireless to Wireless Porting = 97.5%
 - Top 5 Carriers = 94%
 - Other carriers = 6%
- Wireline to Wireless Porting = 2.5%
- Response Times To Port Requests*
 - Cingular Wireless' average = Less than 1 min
 - Top 5 Wireless Carriers average = Less than 3 min
 - Other Wireless Carriers average = 95 min

*The response times include a daily sample over a recent week's period.



Process Improvements

Then	Now
5 or more Field Validation Model	3 Field Validation Model
Carrier Response Times inconsistent, greater than 30 min	Most carriers very consistent, less than 5 mins
Carriers not responding	Bulk Sweeps at initial deployment Porting Centers work on open bridges
Issue equipment once receive a confirm which may mean after customer leaves store	Customer gets a handset at point of sale
Non-standard Top 100 MSA list	Major wireless carriers have implemented same Top 100 MSA list

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Continuing Issues

- Top 100 MSAs
- New Jersey Petition
- N-1 Call Routing
- Waivers/Exemptions
- Type 1 Numbers



How can the FCC assist

- Top 100 MSAs - Issue is “moot” for porting after May 24
- New Jersey - Implement additional counties 5/24
- N-1 Routing - Affirm the originating carrier must perform or negotiate business arrangement for another carrier to perform the database dip and appropriately route local calls
- Waivers/Exemptions - Can state grant? If so, develop method to identify those carriers, exempt status by state/MSA or rate center, N-1 capability of switch so we can inform customer
- Type 1 - Industry working to improve process



Challenges for Intermodal Porting

- Different wireline and wireless operations standards
- LEC Local Service Order Guide (LSOG) developed first
- Wireless Intercarrier Communications Interface Specifications (WICIS)
- Relying on clearinghouse/service bureau as interconnector and to convert processes -
 - Converts Wireless port request to Local service request
 - Sends To LEC for Response
 - LEC Response converted back to wireless response and sent to wireless provider
 - Unique Company business rules
 - Special Services -- Type 1, DSL, reseller, ringtone
 - Various porting methods - FAXs, Email, other manual



What is being done to resolve

- CTIA and USTA host industry meetings weekly
- Clearinghouse conducts multiple meetings with wireless only and joint wireline/wireless companies
- Porting issues being addressed by multiple industry forums
- Joint carrier calls to resolve specific customer escalations and backlog via non-traditional means
- TSI/Neustar testing Type 1, Reseller, and other scenarios with wireline carriers



May Implementation

- Cingular will be ready to port out in all markets
- Expect process to be smooth for large wireless to wireless carriers
- Intermodal porting issues with large carriers will be same as for Top 100 MSAs
- Expect significant problems with rural carriers
 - Increased time and effort by PAC teams to port customers, very costly
 - Rural carriers will have very manual work flows
 - Carrier exemptions from porting will cause significant customer frustration unless carriers are able to notify at at point of sale
 - Issues with proper routing of calls will increase